

1 JAY R. HENNEBERRY (State Bar No. 135065)
jhenneberry@chadbourne.com
2 CHADBOURNE & PARKE LLP
350 South Grand Avenue, 32nd Floor
3 Los Angeles, California 90071
Telephone: (213) 892-1000
4 Facsimile: (213) 892-2045

5 *Of Counsel*
Scott S. Balber
6 sbalber@chadbourne.com
Jonathan C. Cross
7 jcross@chadbourne.com
CHADBOURNE & PARKE LLP
8 30 Rockefeller Plaza
New York, New York 10112
9 Telephone: (212) 408-5100
Facsimile: (212) 541-5369

10 Attorneys for Plaintiff and Counterdefendants
11 LFG NATIONAL CAPITAL, LLC, LAWFINANCE GROUP, INC., and
LFG SERVICING, LLC

12
13 UNITED STATES DISTRICT COURT

14 CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION

16 LFG NATIONAL CAPITAL, LLC,

17 Plaintiff,

18 v.

19 GARY, WILLIAMS, FINNEY, LEWIS,
WATSON & SPERANDO, P.L., WILLIE
20 GARY, and LORENZO WILLIAMS,

21 Defendants.

Case No. CV11-04538 PSG (PJWx)

22
23 **REQUEST FOR JUDICIAL NOTICE
OF LFG NATIONAL CAPITAL, LLC,
LAWFINANCE GROUP, INC., AND
LFG SERVICING, LLC IN SUPPORT
OF THEIR MOTION TO
DISMISS THE COUNTERCLAIMS
PURSUANT TO FED. R. CIV.
P. 12(b)(6)**

24 GARY, WILLIAMS, FINNEY, LEWIS,
WATSON & SPERANDO, P.L.,

25 Counterclaimant,

26 v.

27 LFG NATIONAL CAPITAL, LLC,
LAWFINANCE GROUP, INC., and
LFG SERVICING, LLC

28 Counterdefendants.

Hearing Date: September 12, 2011
Time: 1:30 p.m.
Judge: Honorable Philip S. Gutierrez
Courtroom: 880

REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF MOTION TO DISMISS COUNTERCLAIMS

1 Plaintiff LFG National Capital, LLC and Counterdefendants LawFinance
 2 Group, Inc. and LFG Servicing, LLC, by and through its attorneys, hereby request that
 3 the Court take judicial notice pursuant to Federal Rule of Evidence 201 of the
 4 following documents listed below and attached hereto:

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 6 a. “Cost Loan and Security Agreement,” executed on May 19, 2007,
 7 and the amendments thereto. The Cost Loan and Security Agreement, and
 8 amendments thereto, are referenced in the Complaint and in Defendant Gary,
 9 Williams, Finney, Lewis, Watson & Sperando, P.L.’s Counterclaim. A true and
 10 correct copy is attached as **Exhibit A**.

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 12 The Court may take judicial notice of Exhibit A because “[d]ocuments whose
 13 contents are alleged in a complaint and whose authenticity no party questions, but
 14 which are not physically attached to the pleading, may be considered in ruling on a
 15 Rule 12(b)(6) motion to dismiss.” Brocato v. Dep’t of Corrections, 2009 WL
 16 3489367, at *4 (C.D. Cal. Oct. 26, 2009) (citing In re Stac Elec. Sec. Litig., 89 F.3d
 17 1399, 1405 n.4 (9th Cir. 1996)).

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 19 b. “California Department of Corporations Financial Services
 20 Division Licensee Address Listing of LawFinance Group, Inc.” The document
 21 is a screenshot of the website for the California Department of Corporations
 22 Financial Services Division Licensee Address Listing of LawFinance Group,
 23 Inc, taken on July 14, 2011, which can be found at <http://www.corp.ca.gov/FSD/licensees/default.asp?flag=1&srchtyp=contains&licstatus=active&busname=lawfinance&id=&lictype=&city=&state=&zip>. A true and
 24 correct copy is attached as **Exhibit B**.

1 The Court may take judicial notice of Exhibit B because, pursuant to Federal
2 Rule of Evidence 201, judicial notice may be taken of “matters of public record,” see
3 Lee v. City of Los Angeles, 250 F.3d 668, 689 (9th Cir. 2001), which includes
4 “[r]ecords and reports of administrative bodies.” Barron v. Reich, 13 F.3d 1370, 1377
5 (9th Cir. 1994).

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7 July 20, 2011

CHADBOURNE & PARKE LLP

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By: _____ /s/ Jay R. Henneberry

Jay R. Henneberry

Scott S. Balber

Jonathan Cross

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Attorneys for Plaintiff and Counterdefendant
LFG NATIONAL CAPITAL, LLC
LAWFINANCE GROUP, INC., and
LFG SERVICING, LLC

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